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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO FILE
AMENDED COMPLAINT AND FOR
DEFENDANTS TO FILE REPLY TO
PLAINTIFF’S OPPOSITION TO
DEFENDANTS’ MOTION FOR RULE 11
SANCTIONS**

(THIRD REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until May 20, 2022, to file an Amended Complaint in compliance with the Court’s Order filed on March 30, 2022. ECF No. 178. Additionally, the parties agree to permit Defendants, to and until June 10, 2022, to file a reply to Plaintiff’s opposition (ECF No. 183) to Plaintiff’s motion for FRCP 11 sanctions (ECF No. 174).

Presently, Plaintiff is expected to file an Amended Complaint on May 11, 2022 and Defendants are expected to file a reply brief on May 31, 2022. *See* ECF No. 187. This is the parties’ third request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties rely upon the following:

1. Counsel for Plaintiff have been diligently working on drafting and finalizing an amended pleading. To that end, counsel have spoken to witnesses regarding certain matters that are relevant to the matters alleged in the current pleadings. However, because of witness unavailability and coordination of schedules, some of those conversations were not able to occur until the past few days. Accordingly, counsel for Plaintiff will need an additional short extension of time to complete and file an amended complaint. Counsel for Plaintiff have communicated with counsel for Defendants and the parties, by and through their respective counsel, agree that this additional extension of time is supported by good cause. Counsel for both parties respectfully request the Court approve this Stipulation and permit the following:

- a. Plaintiff shall file an amended complaint on or before May 20, 2022;
- b. Defendants shall file a reply to Plaintiff’s opposition to the FRCP 11 motion on or before June 10, 2022.

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The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

Pavneet S. Uppal, Esq.
Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
Counsel for all named Defendants

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Paul S. Padda, Esq.
David Stander, Esq.
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*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

Dated: May 11, 2022

Dated: May 11, 2022

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: May 11th, 2022